

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 04-12393MLW

TRICORE, INC.

VS.

SAFECO INSURANCE COMPANY OF
AMERICA and R.P. IANNUCCILLO
& SONS CONSTRUCTION CO.

DEFENDANT, R.P. IANNUCCILLO & SONS CONSTRUCTION CO.'S
MOTION TO EXTEND THE FILING DEADLINE FOR
OPPOSITION TO SAFECO'S MOTION FOR A MORE DEFINITE STATEMENT

Now comes the defendant, R.P. Iannuccillo & Sons Construction Co. ("RPI") and hereby moves this Court for an extension of time within which to respond to Safeco Insurance Company's Motion for a More Definite Statement in connection with RPI's Crossclaim against Safeco. RPI requests that it be permitted to file an opposition on or before July 27, 2005.

As grounds therefore, RPI submits that efforts are being made to resolve the motion and that mediation is scheduled for July 19, 2005 before Judge Swartwood.

Defendant/Counterclaim Plaintiff

R.P. Iannuccillo & Sons Construction Co.

By their Attorneys:



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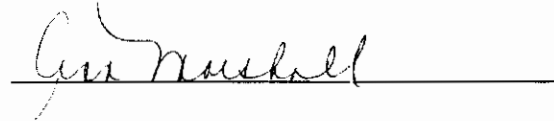
CERTIFICATE OF SERVICE

I, the undersigned, do hereby certify that a copy of the foregoing has been furnished by U.S. Mail, postage prepaid, this 5th day of June, 2005, to:

Edward D. Kutchin, Esquire
Kerry R. Northup, Esquire
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A handwritten signature in cursive script, appearing to read "G. Marshall", is written over a horizontal line.